

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

\* \* \*

JAMAL MURRAY,

Plaintiff,

vs.

CASE NO. 1:14-cv-168

OHIO DEPARTMENT OF

REHABILITATION AND CORRECTION,

Defendant.

\* \* \*

Deposition of JAMAL ANTONIO MURRAY,  
Plaintiff herein, called by the Defendant for  
cross-examination pursuant to the Rules of Civil  
Procedure, taken before me, Lisa M. Conley  
Yungblut, a Notary Public within and for the State  
of Ohio, at the offices of Robert A. Klingler Co.,  
LPA, 525 Vine Street, Suite 2320, Cincinnati,  
Ohio, on Friday, the 15th of June, 2018, at 10:10  
a.m.

\* \* \*

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1 APPEARANCES :

2 On behalf of the Plaintiff:

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JAMAL ANTONIO MURRAY

of lawful age, Plaintiff herein, having been first  
duly sworn as hereinafter certified, was examined  
and deposed as follows:

CROSS-EXAMINATION

BY MS. BOYD:

Q. Good morning, Mr. Murray.

A. Good morning.

Q. If you wouldn't mind quickly just  
stating your full name for the record.

A. Jamal Antonio Murray.

Q. Just to be clear, this is a  
deposition. Have you spoken with your attorney  
about what a deposition is?

A. Yes.

Q. Okay. Have you ever had your  
deposition taken before or testified in court?

A. No.

Q. All right. Did you have a  
conversation with your attorney about the purpose  
of today's deposition?

A. Yes.

Q. Okay. So you understand that we're  
here today so I can ask you questions about the  
lawsuit that you filed against employees of the

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1 State of Ohio?

2 A. Yes.

3 Q. Okay. And you understand that  
4 because this is a deposition and there's a court  
5 reporter here that you're answering questions  
6 under oath?

7 A. Yes.

8 Q. All right. Now, my questions and  
9 your answers will be taken down word for word by  
10 the court reporter; does that make sense?

11 A. Yes.

12 Q. Okay. So with that in mind, you have  
13 to answer audibly. So yes, no, huh-uhs, and head  
14 nods, won't be recorded, so if that happens, the  
15 court reporter might remind you.

16 MR. KLINGLER: Hold on. So we're  
17 clear, I think what you're saying is he should  
18 answer with words.

19 MS. BOYD: A yes or no as opposed to  
20 a head nod.

21 MR. KLINGLER: Yes.

22 MS. BOYD: Thank you.

23 BY MS. BOYD:

24 Q. Another reminder I suppose is that we  
25 can't talk over each other, so I will do my best

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1 to wait to answer -- to ask another question until  
2 you finish answering, and it would be helpful for  
3 the court reporter if you wait until I complete a  
4 question before you start answering, that make  
5 sense?

6 A. Yes.

7 Q. That way there's no confusion. If  
8 you need a break, we've got water and stuff here,  
9 but restroom or anything, just let me know, at any  
10 time, we can take a break, sound good?

11 A. Yes.

12 Q. All right. Is there any reason why  
13 you wouldn't be able to answer my questions  
14 truthfully today?

15 A. No.

16 Q. Are you on any sort of medication  
17 that would affect your ability to answer my  
18 questions?

19 A. No, not that I know of. I mean, I'm  
20 on -- I am on medicine, but I don't think it will  
21 affect --

22 Q. Your doctor hasn't told you that any  
23 of those affect your ability to understand or your  
24 memory or things like that?

25 A. Right.

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1 Q. Okay. All right. Any other reasons  
2 why you would be unable to give truthful answers,  
3 under the influence of any other drugs, alcohol,  
4 anything like that?

5 A. No.

6 Q. No?

7 A. No.

8 Q. Okay. All right. So if you wouldn't  
9 mind, just to get started, what's your date of  
10 birth?

11 A. [REDACTED] 82.

12 Q. Where were you born?

13 A. Cincinnati, Ohio.

14 Q. All right. 1982, that makes you 36?

15 A. This year, I will be.

16 Q. You'll be 36. Okay, gotcha. Are you  
17 married?

18 A. No.

19 Q. Have you ever been married?

20 A. No.

21 Q. What about, do you have any children?

22 A. Yes.

23 Q. How many?

24 A. Two.

25 Q. What are their ages?

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1 A. 17 and 13.

2 Q. Okay. Boy, girl, both boys, both  
3 girls?

4 A. Two boys.

5 Q. All right. Where do you live now?  
6 You don't have to tell me your address, just --

7 A. It's in Evanston.

8 Q. Is that close to Cincinnati?

9 A. Yes, it's in Cincinnati.

10 Q. Okay. Sorry, I'm not familiar with  
11 the area.

12 A. Okay.

13 Q. You said that you were born in  
14 Cincinnati. Did you grow up in Cincinnati as  
15 well?

16 A. Yes.

17 Q. Did you graduate from high school?

18 A. No.

19 Q. What's the highest grade of education  
20 that you completed?

21 A. The ninth.

22 Q. Ninth grade. Why didn't you graduate  
23 from high school, why didn't you go past the ninth  
24 grade?

25 A. I dropped out of school.



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1 Q. Okay. When you stopped going to high  
2 school, did you have a job of any kind while you  
3 were a teenager?

4 A. No.

5 Q. No. So never worked at a grocery  
6 store or anything like that?

7 A. Well, I had done work before, but not  
8 in no grocery store.

9 Q. Okay.

10 A. I worked at Hardee's and General Tour  
11 You.

12 Q. Around when was that?

13 A. I was 17 when I worked at Hardee's.

14 Q. Okay.

15 A. And when I worked for General Tour  
16 You, I can't remember what age. I just remember  
17 it was in my -- about 24, 25, somewhere around in  
18 there.

19 Q. Okay. When you were a kid, did you  
20 wear glasses?

21 A. No.

22 Q. Did you have any trouble seeing or  
23 anything at all?

24 A. No.

25 Q. Did you ever have your vision checked

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1 whenever you were a kid?

2 A. I'm pretty sure. I can't remember,  
3 but I'm pretty sure.

4 Q. Okay. When you were a teenager, did  
5 you learn how to drive?

6 A. Yes.

7 Q. Did you have your driver's license?

8 A. No.

9 Q. Even though you didn't have a  
10 driver's license, did you drive a car?

11 A. Yes.

12 Q. Did you own a car?

13 A. Yes.

14 Q. At what age did you own a car?

15 A. 18, that was my first car, when I was  
16 18, and then I had cars off and on in my 20s.

17 Q. Okay. Did you ever get your driver's  
18 license?

19 A. No.

20 Q. Okay. But you still had cars and  
21 were able to drive them?

22 A. Yes.

23 Q. Gotcha. Now, in 2001, you would have  
24 been 18?

25 A. 2000.

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1 Q. 2000, you would have been 18?

2 A. Is that correct? Count that up.

3 Yes, 2000.

4 Q. All right. Do you recall when you  
5 were first incarcerated in prison; is that when  
6 you were 18?

7 A. Yes.

8 Q. Okay. And that was in 2001, correct?

9 A. Yes.

10 Q. Okay. And that was for two counts of  
11 possession of drugs, one a third degree felony and  
12 one a fourth degree felony?

13 A. Yes.

14 Q. Okay. Do you remember what drug it  
15 was that you were guilty of possessing?

16 A. Yes.

17 MR. KLINGLER: Let me just stop for a  
18 minute and raise an objection. I think we're here  
19 to talk about the extent of his vision loss, so I  
20 mean, I understand some background information may  
21 be relevant to that, but as we get into the  
22 details of his criminal history, I'm going to have  
23 a problem with that.

24 MS. BOYD: Certainly, and I don't  
25 intend to ask particulars.

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1 MR. KLINGLER: Well, that's a  
2 particular.

3 MS. BOYD: Well, I believe that a  
4 certain drug led to some serious medical  
5 conditions, so I think it's relevant to determine  
6 what drugs he was guilty of possessing and  
7 pursuing that line of questioning just a bit  
8 further.

9 MR. KLINGLER: I disagree with you,  
10 but I'm going to let him answer that question and  
11 see where we go.

12 MS. BOYD: Okay.

13 BY MS. BOYD:

14 Q. Mr. Murray, do you remember what drug  
15 it was that you were guilty of possessing?

16 A. Yes.

17 Q. And what was that?

18 A. Crack cocaine.

19 Q. And your sentence was for a  
20 year-and-a-half, but you were there for just a  
21 little over a year; is that right?

22 A. Yes, but I spent I believe about four  
23 months in Queensgate before I went to the  
24 penitentiary.

25 Q. What's Queensgate?

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1 A. It's like a -- it's like the Justice  
2 Center.

3 Q. Okay.

4 A. It's Hamilton County, but at this  
5 time, they had the Justice Center and they had  
6 Queensgate.

7 Q. Gotcha. Prior to going to prison in  
8 2001, had you ever been convicted of any other  
9 offenses?

10 A. At what age?

11 Q. That's what I'm asking, prior to age  
12 18.

13 A. No.

14 Q. No?

15 A. Not that I can think -- driving with  
16 no license.

17 Q. Okay. You indicated that you were  
18 guilty of possessing crack cocaine. Did you use  
19 crack cocaine?

20 A. No.

21 Q. No?

22 A. (Shaking head.)

23 Q. Had you ever used drugs at the time  
24 that you went to prison in 2001?

25 A. No.

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1 Q. Did you sell drugs at the time that  
2 you went to prison in 2001?

3 A. Yes.

4 Q. When did you begin selling drugs?

5 A. 17.

6 Q. Okay. Do you recall what prison you  
7 were in from 2001 to 2002?

8 A. DCI.

9 Q. Okay.

10 A. I don't know the proper name of it,  
11 but I do know that it's DCI. It's in Dayton.

12 Q. While you were in prison from 2001 to  
13 2002, did you work?

14 A. No.

15 Q. Why not?

16 A. I went there because at that age, you  
17 have -- it was mandatory that you was in school.

18 Q. So were you in school while you were  
19 in prison?

20 A. Yes.

21 Q. All right. Taking GED classes?

22 A. Yes.

23 Q. Okay. How often did you take those  
24 GED classes?

25 A. Well, that, I can't really remember.

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1 Q. Okay. Did you complete the GED  
2 classes?

3 A. No.

4 Q. How long does it typically take  
5 someone to get their GED while they're in prison?

6 A. That, I do not know.

7 Q. Okay. That's fine. But were you  
8 taking the classes the whole time that you were  
9 there during that year to year-and-a-half?

10 A. It was a waiting list at first  
11 because they just had -- like when you first go  
12 there, you get put on the waiting list. I can't  
13 remember how long was the waiting list, but I know  
14 I was taking classes.

15 Q. Okay. Did you ever take any classes  
16 to get your GED before you went to prison, so  
17 between ages -- I know you said you stopped going  
18 in the ninth grade, so maybe age 16 to 18, did you  
19 ever take any classes on your own?

20 A. No.

21 Q. Okay. While you were in prison from  
22 2001 to 2002, did you have any major medical  
23 issues that you had to have addressed, like I'm  
24 not talking about a cold or a headache, but  
25 anything major?

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1 A. No.

2 Q. Did you ever have your vision checked  
3 while you were in prison?

4 A. They check -- okay. Before you go to  
5 prison, you've got to go through CRC first, and  
6 they give you a full physical. So yes, I've had  
7 physicals because you have to have a physical  
8 before you go to your parent institution, and they  
9 check your eyes, they check your blood, they just  
10 give you a full physical.

11 Q. Do you recall if there was anything  
12 worth note from that physical that you would have  
13 had in 2001?

14 A. No.

15 Q. Do you recall what your vision was  
16 from your vision exam in 2001?

17 A. 20/20.

18 Q. It was 20/20?

19 A. (Nodding head.)

20 Q. Okay. Now, you were released in  
21 2002, so at that point, you would have been 20?

22 A. Right.

23 Q. Okay. Where did you live upon your  
24 release?

25 A. With my kids' mother.



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1 Q. Okay. Did the kids live there too?

2 A. Yes.

3 Q. And how old were your kids at that  
4 point?

5 A. Well, at that time, I just had one.

6 Q. Okay.

7 A. And he was like 19, 20 months,  
8 something like that.

9 Q. Okay. So he was born while you were  
10 in prison the first time?

11 A. No. I was out, I was 18 and he was  
12 born, but right after he was born, I went to jail.

13 Q. Gotcha, now I understand. While you  
14 were in prison, did you have contact either with  
15 your son or his mother? I understand that he was  
16 a toddler, but --

17 A. Yes, they came and visited me.

18 Q. Okay. When you were living with your  
19 child's mother and your son, where was that?

20 A. At that time -- oh, that's far back.

21 Q. Just generally, was it in Cincinnati?

22 A. Oh, yes.

23 Q. Okay. That's good enough for me.  
24 Did you get a job after your release?

25 A. No.

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1 Q. Why not?

2 A. I really don't know why.

3 Q. Okay. Did you look for a job?

4 A. No.

5 Q. How did you and your child's mother  
6 support yourselves? Did she have a job?

7 A. Yeah, she did.

8 Q. Okay. Even though you didn't have a  
9 formal job, did you bring in any income of any  
10 kind?

11 A. Yes.

12 Q. And how did you bring in income?

13 A. Selling drugs.

14 Q. What kind of drugs did you sell?

15 A. Crack cocaine.

16 Q. Did you use drugs at that time?

17 A. No, no.

18 Q. Okay. Did you have any medical  
19 issues after your release from prison in 2002?

20 A. No.

21 Q. Did you ever go to a doctor between  
22 2002 and 2005 that you can recall?

23 A. No.

24 Q. Did you ever have your vision checked  
25 between 2002 and 2005?

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1 A. No.

2 Q. From 2002 to 2005, so about age 20 to  
3 22, 23, did you have a car?

4 A. Yes.

5 Q. Okay. But you didn't have your  
6 driver's license?

7 A. No.

8 Q. Okay. Did your child's mother have a  
9 car?

10 A. No.

11 Q. What kind of things did you do for  
12 fun between 2002 and 2005, whenever you were 20 to  
13 23?

14 A. I can't really remember.

15 Q. Kind of like generally, what kind of  
16 stuff did you enjoy doing?

17 A. I used to take my kids -- well, my  
18 son at that time fishing, and we went to King's  
19 Island a couple of times that I can recall.

20 Q. Okay. Do you like sports?

21 A. Yes.

22 Q. What kind of sports?

23 A. Football.

24 Q. All right. Now, in 2005, you went  
25 back to prison; is that correct?

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1 A. Yes.

2 Q. Okay. And at that point, I think we  
3 established you were 22?

4 A. I can't -- I don't know what age I  
5 was.

6 Q. Okay.

7 A. I'm going to have to add it up.

8 Q. Okay. And at that point, you went  
9 back to prison for one count of possession of  
10 drugs and one count of drug trafficking?

11 A. Yes.

12 Q. Was that the crack cocaine that we  
13 just talked about?

14 A. Yes.

15 Q. Your sentence was for two years and  
16 four months, but you were there just a little  
17 under two years; is that right?

18 A. Yes.

19 Q. Had you been convicted of any  
20 offenses between your release from prison in 2002  
21 and your return to prison in 2005?

22 A. I know between -- I went to prison in  
23 2001. Between that and 2005, I had did nine  
24 months in the Justice Center, and that was for  
25 driving without no license.

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1 Q. Okay.

2 A. Because I had multiple of them, so  
3 they gave --

4 Q. So they kind of added up?

5 A. They gave me 18 months, but I had  
6 mitigated out at 9 months.

7 Q. Gotcha. Okay. Have you ever been  
8 incarcerated in another state?

9 A. Yes.

10 Q. When was that?

11 A. 2007.

12 Q. Okay. We can talk about that  
13 whenever we -- we'll go chronologically just so we  
14 don't confuse each other, how does that sound?

15 A. Um-hmm.

16 Q. Do you recall what prison you were in  
17 from 2005 to 2006?

18 A. Oh, what's that prison called? I  
19 know the nickname of it was gladiator school,  
20 but --

21 Q. Just curious, why was the nickname  
22 gladiator school?

23 A. You know, that's a good question. I  
24 never did know. But what was that prison called?  
25 I can't remember the name of the prison.

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1 Q. That's okay. When you were in prison  
2 from 2005 to 2006, did you work?

3 A. No.

4 Q. Did you take any classes to get your  
5 GED?

6 A. Yes.

7 Q. Okay. At that point, how far along  
8 were you in getting your GED, since you had been  
9 taking classes from 2001 to 2002 and then again?

10 A. I can't remember, but I know that  
11 it's the same thing. When you go to a prison,  
12 when you go there, you get put on the waiting list  
13 before you even get into school. So I can't  
14 really remember how long it took me to get in  
15 school, that part I don't know.

16 Q. Okay. Was it required that you take  
17 classes towards your GED?

18 A. Yes.

19 Q. So that wasn't something you chose to  
20 do, you had to do it?

21 A. It's mandatory if you don't have your  
22 GED.

23 Q. Gotcha. Before you went back to  
24 prison in 2005, between 2002 and 2005, did you  
25 take any steps to continue the classes for your

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1 GED?

2 A. No.

3 Q. Did you have any major medical issues  
4 that had to be addressed from 2005 to 2006 while  
5 you were in prison?

6 A. No.

7 Q. Did you have your vision checked  
8 whenever you entered in again?

9 A. The same thing, before you go to  
10 prison, you have to go through CRC.

11 Q. Same thing?

12 A. Um-hmm.

13 Q. Do you recall what your vision was at  
14 that time?

15 A. Perfect, I could see.

16 Q. 20/20?

17 A. Yes.

18 Q. All right. So you were released in  
19 2006, you're 24; does that sound right?

20 A. That's about right.

21 Q. Okay. Where did you live upon your  
22 release in 2006?

23 A. Cincinnati.

24 Q. Did you live by yourself?

25 A. No.

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1 Q. Who did you live with?

2 A. My kids' mother.

3 Q. And did you live with your children  
4 as well?

5 A. Yes.

6 Q. Did you still have just one child at  
7 that point or was your second son born?

8 A. Two, I had two at that time because  
9 my youngest was born in '04.

10 Q. Okay. So he would have been two, and  
11 then so that would have made your oldest, what,  
12 about six?

13 A. When I came home?

14 Q. Yes.

15 A. Yes.

16 Q. Okay.

17 A. Because he was born in 2000, so yeah.

18 Q. Okay. And you said you lived in  
19 Cincinnati?

20 A. Yes.

21 Q. All right. Did you get a job after  
22 your release in 2006?

23 A. No.

24 Q. Did you look for a job?

25 A. (Shaking head.)



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1 Q. I don't not?

2 A. Because my plan was to go to Denver,  
3 Colorado, and that's what I did.

4 Q. Your plan was to go to Denver?

5 A. Yeah.

6 Q. So you didn't want to look for a job  
7 here?

8 A. No.

9 Q. Why were you planning to go to  
10 Denver?

11 A. To get away from Ohio to try to start  
12 my life over.

13 Q. Okay. Did you go to Denver?

14 A. Yes.

15 Q. When did you go to Denver?

16 A. March 2007.

17 Q. Okay. Did your child's mother and  
18 your children go with you?

19 A. No.

20 Q. Why not?

21 A. Money problems, and on top of that,  
22 it was like why would I drag them along with me  
23 and not have nowhere -- and I have nowhere for us  
24 to stay up there, so I have to make the way first.

25 Q. That makes sense. Did you find a

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1 place to live when you went out to Denver?

2 A. Yes, but I had got involved with  
3 another woman.

4 Q. Okay. All right. You indicated that  
5 you then went to prison in Colorado in 2007; is  
6 that correct?

7 A. No. I went to jail.

8 Q. Into jail, excuse me. Okay. Without  
9 getting into the particulars, what caused you to  
10 go to jail in Colorado in 2007?

11 A. A threat.

12 Q. Okay. Were you working in Colorado?

13 A. No.

14 Q. How were you supporting yourself  
15 while you were in Colorado?

16 A. Well, I had a few women who I was  
17 dealing with, and it was just a whole mess.

18 Q. They would support you --

19 A. Yes.

20 Q. -- is that what you're saying?

21 A. (Nodding head.)

22 Q. Were you selling drugs in Colorado  
23 also to make ends meet?

24 A. Not until 2008.

25 Q. Were you still in Colorado at that

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1 point?

2 A. Well, I had came back to Cincinnati  
3 May of 2007 for Mother's Day and for my kids'  
4 mother's birthday. And I went back to Colorado in  
5 2007, I believe it was July, and that's when I had  
6 caught threats in December 2007, and I was locked  
7 up for six months. And I had got out, and they  
8 had wanted to put me on probation, and during the  
9 time that I was out, I had caught a possession of  
10 crack cocaine.

11 Q. Is that in Colorado?

12 A. In Colorado, yeah.

13 Q. In Colorado, okay. So were you  
14 selling crack cocaine again?

15 A. Yes.

16 Q. Okay. When did that start?

17 A. When I had got out of Boone for six  
18 months, and from -- let me see, I was locked up  
19 December '07, January, February, March, April,  
20 May, so I got out in May 2008.

21 Q. Okay.

22 A. So I got back in again and that  
23 didn't work for me.

24 Q. Gotcha.

25 A. So --

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1 Q. When you went out to Colorado -- and  
2 I apologize if I already asked you this -- did you  
3 look for work?

4 A. No.

5 Q. Why not? I know that you indicated  
6 the relationships that you had, but was there any  
7 other reason why you didn't look for work?

8 A. No, there wasn't no other reason, no.  
9 I just didn't.

10 Q. Were you able to work?

11 A. Yes.

12 Q. Okay. At that point whenever you  
13 began selling crack cocaine again, were you using  
14 crack cocaine?

15 A. No.

16 Q. Okay. While you were in Colorado,  
17 did you take any classes to get your GED?

18 A. No.

19 Q. Did you have any medical issues?

20 A. No.

21 Q. No, between 2006 and 2008?

22 A. No.

23 Q. Did you ever have your vision checked  
24 during that time?

25 A. No.

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Jamal Antonio Murray

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1 Q. Now, in 2008, you suffered a heart  
2 attack; is that correct?

3 A. Yes.

4 Q. Okay. Tell me about the onset of  
5 your symptoms for that heart attack.

6 A. Chest pain.

7 Q. Were you in Colorado or back here in  
8 Cincinnati when that happened?

9 A. In Cincinnati.

10 Q. When did you come back to Cincinnati?

11 A. It was in '08, like the middle of  
12 '08, because I had run. I thought I had got out  
13 from that possession of crack cocaine. I had run,  
14 I mean, I had ran from the law, when I came back  
15 to Cincinnati.

16 Q. So were you ever incarcerated in  
17 Colorado for the possession of crack cocaine?

18 A. Yeah. I went to prison for two  
19 years.

20 Q. I apologize if you said that. Okay.  
21 You came back to Ohio?

22 A. Right. I didn't go to prison until  
23 2009 --

24 Q. Okay.

25 A. -- when I had caught my case here in

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Jamal Antonio Murray

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1 '08 and I had posted bail, but I had a holder, so  
2 Colorado came and got me, so I got sentenced up  
3 there first. I filed for speedy trial for Ohio.  
4 They came and got me out of the penitentiary,  
5 sentenced me, and then I went back up there to  
6 Colorado. Then, I went to the parole hearing, and  
7 they had told me that since my time in Ohio  
8 overlaps Colorado, I could just do it in Ohio.

9 Q. What time was this that you were  
10 doing in Ohio at that point in 2009?

11 A. Okay. Say that again.

12 Q. You said that your time overlapped.  
13 What were you doing time for in Ohio that  
14 overlapped with your time in Colorado?

15 A. Oh, the felonious assault.

16 Q. Now I understand, okay. Backing up  
17 though, let's go back to your heart attack in  
18 2008. You said that you felt chest pains. Were  
19 there any other symptoms or things that --

20 A. Chest pains.

21 Q. Just chest pains. Okay.

22 A. I was in the Justice Center.

23 Q. Okay. And I take it, did they take  
24 you to the hospital?

25 A. Yes.

Jamal Murray vs Ohio Dept. of Rehab and Correction

Jamal Antonio Murray

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1 Q. And you were treated?

2 A. Um-hmm.

3 Q. Were you informed what the cause of  
4 your heart attack was?

5 A. I can't remember. I know it was in  
6 my medical file.

7 Q. Were you ever told that cocaine use  
8 was the cause of your heart attack?

9 A. You know what, yeah, yeah, that's  
10 right. They had told me because it was in my  
11 system, that's right.

12 Q. You told me a few times that when you  
13 were selling cocaine beginning when you were 17  
14 that you weren't using cocaine.

15 A. No.

16 Q. At what point did you begin using  
17 cocaine?

18 A. I never did. This is the way it  
19 happened. So when you go through the Justice  
20 Center, right, they strip search you. Now, I know  
21 that I got this crack cocaine between my butt  
22 cheeks, so I shoved it, that's how it was in my  
23 system, because when you go to the justice center,  
24 they strip search you. So after they strip search  
25 you, I went into the bathroom, I got it out, I

Jamal Murray vs Ohio Dept. of Rehab and Correction

Jamal Antonio Murray

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1 flushed it.

2 Q. You didn't -- you don't mean you  
3 flushed it down the toilet, you mean you flushed  
4 it into your system?

5 A. No. I flushed it down the toilet.

6 Q. Okay. I'm confused.

7 A. Okay. I'm in the back seat of the  
8 police car.

9 Q. Okay.

10 A. I pushed this crack cocaine up my  
11 cheeks --

12 Q. I'm with you.

13 A. -- so when I go through the Justice  
14 Center, I don't get caught with it. As they strip  
15 search me, I go to the bathroom, I get it out and  
16 I flush it. But that's how the crack was in my  
17 system, and, plus, when you touch it, it gets in  
18 your pores.

19 Q. Was it in a baggy?

20 A. Yeah, uh-huh.

21 Q. How much crack cocaine was it?

22 A. I don't remember, like 4 or 5 grams  
23 or something like that.

24 Q. How -- using your hands, how much is  
25 that, how much crack cocaine is 4 or 5 grams?



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Jamal Antonio Murray

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1 A. (Indicating.)

2 Q. About the size of like a 50 cent  
3 piece or a silver dollar?

4 A. Yeah.

5 Q. Yeah?

6 A. (Nodding head.)

7 Q. Okay. And so you were told then that  
8 cocaine use was the cause of your heart attack?

9 A. Right.

10 Q. But you never used cocaine?

11 A. No.

12 Q. The only time that cocaine was in  
13 your system was whenever you had tried to conceal  
14 it going into the institution?

15 A. Right, and it's in my system because  
16 I'm selling it, so I'm touching it on a day-to-day  
17 basis.

18 Q. Okay, okay. And you had been selling  
19 cocaine whenever you came back to Cincinnati as  
20 well?

21 A. Right.

22 Q. All right. When you came back to  
23 Cincinnati, did you ever try and find a different  
24 kind of employment?

25 A. I was on the run from Colorado.

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Jamal Antonio Murray

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1 Q. I understand.

2 A. I had a warrant, so how can I look  
3 for a job?

4 Q. Okay. What sorts of treatment did  
5 you receive after you had the heart attack?

6 A. A stent in my heart --

7 Q. Okay.

8 A. -- and medication.

9 Q. Do you recall what kind of  
10 medication?

11 A. No, I don't.

12 Q. Were you treated with aspirin?

13 A. I treat with aspirin now.

14 Q. Do you recall if you were treated  
15 with aspirin then?

16 A. I can't remember. I know I was on  
17 medication, though, I just can't remember what  
18 medication.

19 Q. Okay. Did you also receive treatment  
20 for high cholesterol?

21 A. Who?

22 Q. High cholesterol.

23 A. I can't remember.

24 Q. Do you recall if you were on one  
25 medication or more than one medication after your

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Jamal Antonio Murray

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1 heart attack in 2008?

2 A. I think maybe two. I just don't  
3 remember.

4 Q. That's okay. Do you remember what  
5 hospital they took you to?

6 A. University.

7 Q. University in Cincinnati?

8 A. Cincinnati, um-hmm.

9 Q. And you were there just for a few  
10 days in 2008?

11 A. Something like that. I can't  
12 remember how many days, but I do know they took me  
13 there, and I wound up back in the Justice Center.

14 Q. Did you ever go back to University  
15 Hospital for any sort of follow-up?

16 A. I was locked up.

17 Q. I know, but I didn't know if they  
18 took you back there for any sort of follow-up.

19 A. Oh, no.

20 Q. No?

21 A. No.

22 Q. Okay. I know you don't recall what  
23 medications you were on, but do you recall if the  
24 Justice Center distributed them to you?

25 A. Yes, they did.

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Jamal Antonio Murray

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1 Q. Okay. Did you take them regularly?

2 A. Yes.

3 Q. Did you ever miss a dose?

4 A. Not that I recall, no.

5 Q. Okay. How did you feel after your  
6 heart attack?

7 A. Normal.

8 Q. No concerning symptoms or anything?

9 A. No.

10 Q. Did you suffer from headaches?

11 A. No.

12 Q. Any of that chest pain that you  
13 talked about?

14 A. No.

15 Q. So you were in the Justice Center --  
16 I'm sorry, I know that you explained this, but I  
17 want to make sure that we're clear -- on what  
18 charges?

19 A. Felonious assault, aggravated  
20 robbery, aggravated burglary, and I had the case  
21 from Colorado.

22 Q. Okay. So you were serving time on  
23 all four of those charges?

24 A. Right.

25 Q. Both cases?

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Jamal Antonio Murray

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1 A. Basically, right.

2 Q. Gotcha. So from the time that you  
3 got back from Colorado until you entered into  
4 prison, you were in the Justice Center pretty much  
5 the whole time; is that fair?

6 A. Right.

7 Q. Okay. Were you ever not in the  
8 Justice Center for a period of time whenever you  
9 came back to Cincinnati?

10 A. Yeah, because they had extradited in  
11 '09, but I can't remember what month that was, but  
12 extradited me in '09 to Colorado, like I had told  
13 you.

14 Q. Um-hmm.

15 A. I spent some time up there. I got  
16 sentenced. I went to prison in Colorado. I filed  
17 for speedy trial for Cincinnati. Cincinnati came  
18 and got me from out of the penitentiary in  
19 Colorado. I came back down here to Cincinnati, I  
20 get sentenced in Cincinnati.

21 Q. Let me stop you real quick. Before  
22 you got sentenced, were you being held or were you  
23 out?

24 A. I was being held.

25 Q. Okay. All right. So the whole time

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Jamal Antonio Murray

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1 that you were in Cincinnati after you came back  
2 from Colorado, you were being held?

3 A. Right.

4 Q. Gotcha. Okay. We're on the same  
5 page now. So you were held in the Justice Center  
6 and then you were transported to ODRC in 2010?

7 A. Yes.

8 Q. Okay. So you never got out --

9 A. Hold on, wait. When you say O --

10 Q. The Ohio Department of Corrections?

11 A. Is that CRC?

12 Q. Yeah.

13 A. Yeah.

14 Q. 2010 you go through CRC, so you go  
15 through the physical exam again?

16 A. Um-hmm.

17 Q. Did they note anything since you had  
18 had a heart attack a few years earlier?

19 A. Did they note anything?

20 Q. Yeah.

21 A. I don't know. I don't think so.

22 Q. They didn't tell you anything that  
23 you needed to be cautious of or wary of?

24 A. No.

25 Q. Did they check your vision again?

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1 A. Yes.

2 Q. And what was your vision at that  
3 point?

4 A. 20/20.

5 Q. Okay. After you were in CRC, you  
6 went to Lebanon?

7 A. Yes.

8 Q. Is that correct?

9 A. (Nodding head.)

10 Q. Okay. And then you were transferred  
11 to Pickaway after you were in Lebanon to serve out  
12 the rest of your time?

13 A. Yes, that was in 2014.

14 Q. Okay. While you were in prison from  
15 2010 to 2014, did you work?

16 A. No. I went to school.

17 Q. Okay. And was this the mandatory GED  
18 classes?

19 A. Yes.

20 Q. Okay. During those four years, did  
21 you complete your GED classes?

22 A. No, because in 2012, that's when I  
23 started losing my eyesight, so they took me out of  
24 school.

25 Q. Okay. Had you taken any steps

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Jamal Antonio Murray

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1 between -- let me back up.

2 When you were in prison in Colorado,  
3 did they require you to take GED classes?

4 A. Yes.

5 Q. So this was your fourth time taking  
6 GED classes?

7 A. Yes.

8 Q. Okay.

9 A. And up there, it's the same game.  
10 There's a waiting process, but at this time, you  
11 have to be doing something, so they had me working  
12 in the kitchen while I'm waiting to get into  
13 school.

14 Q. Are you talking about in Colorado?

15 A. Yes.

16 Q. Okay. Now, before we get into the  
17 specifics of anything about your incarceration  
18 from 2010 to 2014, I want to talk just briefly  
19 about this lawsuit. It's my understanding that  
20 you believe that the defendants failed to provide  
21 you with adequate medical treatment while you were  
22 in Lebanon; is that correct?

23 A. Yes.

24 Q. All right. And you're also alleging  
25 that Dr. Hyde and Ms. Weiss retaliated against



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1 you?

2 A. Yes.

3 Q. Okay. Tell me, generally, how did  
4 the doctors and the rest of the medical personnel  
5 you name in your complaint fail to provide you  
6 with adequate medical care?

7 MR. KLINGLER: I'm going to -- well,  
8 I'm going to object to the question, first of all,  
9 to the extent that it calls for a medical or legal  
10 opinion, and also it goes beyond the scope of the  
11 purpose of this deposition.

12 MS. BOYD: Are you just stating an  
13 objection and allowing him to answer?

14 MR. KLINGLER: I'm asking you to  
15 withdraw the question and in compliance with the  
16 judge's order.

17 MS. BOYD: Well, I suppose addressing  
18 your first point, I'm asking him to state what he  
19 believes they did that was inadequate. I'm not  
20 asking him to state it in terms of a legal  
21 conclusion or using any medical terminology, in  
22 his opinion. And, furthermore, I believe that  
23 going into that sort of information is not afoul  
24 of the court's order because it is reasonably  
25 likely to lead to information that is within the

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1 scope of this deposition.

2 MR. KLINGLER: I don't think so. I  
3 mean, this is supposed to be about the extent of  
4 his disability. It's not supposed to be about  
5 what he thinks they did wrong; that's liability  
6 and causation, that's not damages. So I've let  
7 you ask a lot of questions that go beyond what I  
8 think the scope of the discovery is supposed to  
9 be, and now you're starting to ask him questions  
10 that go to things having really nothing to do with  
11 damages.

12 MS. BOYD: I will move on from this  
13 question, but I think that this might come up  
14 again and we can address it again at that time --

15 MR. KLINGLER: All right.

16 MS. BOYD: -- with a different  
17 question.

18 BY MS. BOYD:

19 Q. I want to talk generally about how  
20 you received medical care while you were in prison  
21 in Ohio.

22 A. Okay.

23 Q. What is a health service request?

24 A. It's a form you fill out to be seen  
25 by the nurse or the doctor or the nurse

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1 practitioner.

2 Q. How do you go about getting those  
3 forms?

4 A. You ask the CO or you can stop at the  
5 infirmary and ask the CO that's in the infirmary.

6 Q. At any point whenever you were in  
7 prison in Ohio, did you have any trouble getting  
8 one of those forms?

9 A. No.

10 Q. Okay. So if you needed to see a  
11 nurse in prison, is the process to fill out one of  
12 those forms?

13 A. Yes.

14 Q. What about if you want to see a  
15 doctor?

16 A. You have to see the nurse first --

17 Q. Okay.

18 A. -- before you see the doctor.

19 Q. And then do they give you a referral?

20 A. Right.

21 Q. Okay. To see the nurse, do you have  
22 to have an appointment?

23 A. Yes.

24 Q. And that comes from the health  
25 service request?

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1 A. Yes.

2 Q. If you have an appointment, how are  
3 you notified of that appointment?

4 A. By the COs.

5 Q. How are you told to go to that  
6 appointment?

7 A. How is you told to go?

8 Q. Yeah. So let's say you have an  
9 appointment Tuesday at 1:00. Tuesday at 1:00  
10 comes, do you just leave or does someone come and  
11 get you?

12 A. No. They send a pass from the  
13 infirmary to you and a CO gives it to you. You  
14 get a pass and you go to the infirmary.

15 Q. Okay. Have you ever had an occasion  
16 where you weren't given a pass?

17 A. Not that I recall.

18 Q. Okay. If you have medications that  
19 you need to take while you're in prison, how do  
20 you go about getting those?

21 A. They have something that they say --  
22 okay. The COs, they would mention med call, and  
23 you leave out your cell and you go to the  
24 infirmary, and you stand in line and you get your  
25 medicine.

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1 Q. So it's not something that you can  
2 keep with you in your cell?

3 A. Some medications, they will, but  
4 certain ones, they won't.

5 Q. What type of medications can you keep  
6 in your cell?

7 A. I can't -- I mean, you can't keep  
8 narcotics in your cell.

9 Q. Okay. When you had to get your blood  
10 drawn, what was the process for that?

11 A. They wake you up at like 4 in the  
12 morning, they wake you up, and they send you to  
13 the infirmary.

14 Q. Okay. Who draws your blood?

15 A. A nurse.

16 Q. Is it the same nurses that you see at  
17 nurse sick call?

18 A. No.

19 Q. Okay. So a different staff?

20 A. Right, right.

21 Q. Okay. Did a doctor ever draw your  
22 blood?

23 A. No.

24 Q. Okay. Now, when you entered prison  
25 most recently in 2010, you had already had your

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1 heart attack, and you said that you were on a  
2 bunch of medications; is that right?

3 A. Not a bunch.

4 MR. KLINGLER: Object. That  
5 mischaracterizes his testimony.

6 BY MS. BOYD:

7 Q. I apologize. You were on  
8 medications; is that correct?

9 A. Yes.

10 Q. Okay. Regardless of how many there  
11 were, all of the medications that you were on, did  
12 you continue to take them in prison?

13 A. Yes.

14 Q. Okay. Now, in 2010 was the first  
15 time that you were ever diagnosed with deep vein  
16 thrombosis; is that right?

17 A. Is that a blood clot?

18 Q. Yeah.

19 A. Yes.

20 Q. Okay. Tell me about the symptoms  
21 that you had before that blood clot.

22 A. Pain in my -- pain and swelling in my  
23 right calf.

24 Q. Okay. Who did you notify about this  
25 pain and swelling?

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1 A. The CO.

2 Q. And then how did you end up getting  
3 treatment?

4 A. The CO had sent me to the infirmary,  
5 and I had told them my leg is hurting and it's  
6 swelling, and they told me it could be something  
7 serious, so they sent me to the hospital.

8 Q. Okay. What happened whenever you  
9 went to the hospital?

10 A. They told me that it was a blood clot  
11 in my right calf.

12 Q. Okay. Did they give you medication  
13 for that?

14 A. Yes.

15 Q. Do you recall what medication that  
16 was?

17 A. Coumadin.

18 Q. Coumadin?

19 A. And Lovenox, but the Lovenox, I was  
20 on it only for a couple of days, and that's I  
21 guess to speed up -- to speed up the blood level  
22 for the Coumadin or ever how that all works.

23 Q. When you returned to prison after  
24 being in the hospital, did you continue to take  
25 the Coumadin?

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1 A. Yes.

2 Q. And were you monitored?

3 A. In CRC?

4 Q. Were you in CRC at this point or were  
5 you at Lebanon?

6 A. I mean, I was taking it at both  
7 places.

8 Q. Okay.

9 A. So you want to know if I was  
10 monitored at CRC or at Lebanon?

11 Q. Let's go with both.

12 A. CRC, yes, and they drew my blood, and  
13 after I had the blood clot in my calf, I was only  
14 at CRC not that many days, so I was shipped off to  
15 Lebanon. I get to Lebanon, I can't remember when  
16 they had drew my blood at that time, but I knew  
17 that they was drawing my blood, and they told me  
18 to take this medicine, and I took it.

19 Q. Okay. Were you admitted to the  
20 hospital again in April of 2011 because your leg  
21 was swelling again?

22 A. I don't remember what month, but I  
23 know I had went back to the hospital where they  
24 had sent me to FMC first because my whole -- at  
25 this time, now my whole leg is swollen, so they



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1 send me to FMC, and they -- I was in like a cell  
2 with other inmates, and we was given our medicine.  
3 But I can't remember if they had sent me to the  
4 hospital from FMC or they just sent me back to the  
5 penitentiary, I can't remember.

6 Q. Okay. When your leg began to swell,  
7 you said that you notified a CO the first time.  
8 Who did you notify the second time when your leg  
9 began to swell?

10 A. I had put in a medical slip to the  
11 infirmary.

12 Q. Okay. And did they see you?

13 A. Um-hmm.

14 Q. And then did they determine that you  
15 needed to go to the hospital?

16 A. They determined I needed to go to  
17 FMC.

18 Q. Okay.

19 A. Franklin Medical Center.

20 Q. Is that like a hospital?

21 A. Yeah. It's a prison hospital, but  
22 it's like a hospital.

23 Q. Okay. So they determined you needed  
24 more treatment than what they could give you at  
25 the prison?

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1           A.    I can't remember all they had  
2 determined. I just know they put me on medicine  
3 and I had to take it. As a matter of fact, it was  
4 the same medicine, Coumadin.

5           Q.    Coumadin?

6           A.    And while I was there, they had drew  
7 my blood.

8           Q.    I'm going to stop you. When you say  
9 there, do you mean FMC?

10          A.    Yes.

11          Q.    Okay. I'm sorry. Go ahead. You  
12 said they drew your blood?

13          A.    And I took medicine.

14          Q.    Did they do something called check  
15 your INR?

16          A.    That's what it is.

17          Q.    When they draw your blood, you're  
18 talking about them checking your INR?

19          A.    Yes.

20          Q.    Did they explain to you why they were  
21 checking your INR?

22          A.    Yes, because my blood level --  
23 because the INR level and the doses of the  
24 Coumadin have to be on the same track.

25          Q.    Okay. Before you had gone to FMC,

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1 were they checking your INR level at Lebanon?

2 A. Yes.

3 Q. How long were you in FMC; do you  
4 recall?

5 A. No.

6 Q. Okay. Did you go back to Lebanon  
7 then?

8 A. Yes.

9 Q. Were they continuing to provide you  
10 with Coumadin?

11 A. Yes.

12 Q. And checking your INR level?

13 A. Yes.

14 Q. Now, were you told whenever you were  
15 discharged from FMC that you had to be diligent  
16 about making sure that your INRs were checked?

17 A. Diligent?

18 Q. Yeah.

19 A. Not that I recall.

20 Q. Okay. Or that it was important?

21 A. Yes, that, yes, important, yes.

22 Q. So they stressed to you the  
23 importance of getting your INR levels checked?

24 A. Yes.

25 Q. Okay. And in July 2011, do you

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1 recall being evaluated by hematology?

2 A. No.

3 Q. Okay. Do you recall learning around  
4 that time that you were considered to have  
5 hereditary protein C and protein S deficiency?

6 A. Yes.

7 Q. Okay. Did that occur while you were  
8 in the hospital again or while you were at  
9 Lebanon?

10 A. I can't remember who had told me  
11 that. I know it was a doctor. I don't know if it  
12 was Ohio State or the doctor at Lebanon. I  
13 remember somebody mentioning that.

14 Q. Okay. So you were receiving a lot of  
15 care during this time; is that an accurate  
16 statement?

17 MR. KLINGLER: Object to the form.

18 BY MS. BOYD:

19 Q. You can answer.

20 A. Oh, okay. I know I was receiving  
21 care, but -- yes, I was receiving care.

22 Q. So you were receiving care at  
23 Lebanon?

24 A. Um-hmm.

25 Q. You were receiving care at FMC when

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1 Lebanon referred you there?

2 A. Um-hmm.

3 Q. And you were receiving care at OSU  
4 hospital whenever FMC decided that you needed to  
5 go there?

6 A. Yes.

7 Q. Okay. And throughout 2011, were you  
8 continued on Coumadin?

9 A. Yes.

10 Q. And were you informed of the  
11 importance of taking your Coumadin?

12 A. Yes.

13 Q. You were having your INR levels  
14 checked regularly?

15 A. Yes.

16 MS. BOYD: Okay. Is it okay if we  
17 take a quick break?

18 MR. KLINGLER: Sure.

19 MS. BOYD: Just about 5 minutes.

20 (Brief recess.)

21 BY MS. BOYD:

22 Q. We were talking before we took a  
23 break about how throughout 2011, you were on  
24 Coumadin, and throughout 2011, your INR levels  
25 were being checked; is that correct?

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1 A. Yes.

2 Q. Okay. Now, do you recall having an  
3 appointment to see the doctor on December 28th,  
4 2011?

5 MR. KLINGLER: Let me just stop and  
6 raise an objection. This goes beyond the judge's  
7 order, so unless you can explain to me how this  
8 relates to the extent of his damages, I'm going to  
9 instruct him not to answer.

10 MS. BOYD: I believe that all of his  
11 medical care goes to the extent of his damages,  
12 what care he did or did not receive goes to the  
13 extent of his damages.

14 MR. KLINGLER: I disagree, so I'm  
15 going to instruct him not to answer.

16 MR. KENNEDY: If he chose to -- I  
17 mean, the thrust of his damages is the amount of  
18 pain and suffering that resulted from any care,  
19 any that persists to this day. So if he did or  
20 did not see a physician during that time, that  
21 either suggests that he had increased or less pain  
22 and suffering or more. You know, the complaint  
23 says he continuously went to the physician the  
24 entire time. So the basis for him going to the  
25 physician, that being his pain and suffering that

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1 he alleges, is like of the utmost relevance.

2 MR. KLINGLER: I'm not sure I  
3 followed you. You're saying that the questions  
4 are directed to the pain and suffering that he  
5 underwent while he was locked up?

6 MR. KENNEDY: If he was -- if he had  
7 continuous, ongoing unbearable pain and suffering  
8 in the month of January of 2012 as is suggested in  
9 the complaint, then, the degree to which he sought  
10 medical care and the basis for that obviously  
11 speaks to that suffering, which is what the  
12 damages are about, at least part of what the  
13 damages are about.

14 MR. KLINGLER: Yeah, I don't buy it,  
15 I just don't, I just don't buy it. Look, I mean,  
16 I printed out the judge's order just to be sure,  
17 and her order granting the request to take his  
18 deposition, or as you requested a few other  
19 depositions perhaps, the judge says: Defendants  
20 move for an order reopening discovery 60 days to  
21 allow inquiry into the level of plaintiff's vision  
22 impairment, Document 84. Defendants represent  
23 that good cause exists to modify the scheduling  
24 order due to existing settlement discussions.  
25 Defendants explained that, quote, a myriad of

1 factual allegations concerning plaintiff's  
2 abilities and his level of vision accompanied the  
3 settlement demand, end quote, that, quote, had  
4 never before been brought to their attention, end  
5 quote. Defendants further explain they need to  
6 conduct a few short depositions to investigate the  
7 extent of plaintiff's injuries in order to  
8 continue engaging in settlement discussions and  
9 craft a well-reasoned dispositive motion.

10 That's what she ordered. And in our  
11 phone conference the other day, I think the judge  
12 reiterated that that was her understanding and  
13 that was her intent, that the extent of  
14 Mr. Murray's visual impairment is the issue that  
15 she is allowing inquiry into, and that's all I'm  
16 going to allow Mr. Murray to answer. And we've  
17 spent about an hour on the record getting  
18 background information, a little bit of which is  
19 relevant to questions concerning what his vision  
20 was like before this injury, but, otherwise, I let  
21 you go on in a lot of different areas. I'm just  
22 not going to do it anymore because it's way beyond  
23 what the judge ordered.

24 MS. BOYD: To respond to the court  
25 permitting inquiry into the extent of his



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1 injuries, she specifically stated that experts  
2 opining clearly on causation who had never treated  
3 him did not speak to the extent of his injuries;  
4 however, Mr. Murray testifying as to what injuries  
5 he suffered at what point throughout his care in  
6 prison is not something that she strictly  
7 prohibited in our phone conversation.

8 MR. KLINGLER: Well, all I --

9 MS. BOYD: So if the order is  
10 allowing discovery to be reopened to investigate  
11 the extent of his injuries, how is discussing what  
12 injuries he suffered throughout his incarceration  
13 not relevant in leading to the discovery of what  
14 his injuries are today?

15 MR. KLINGLER: Visual impairment is  
16 the injury that we're alleging, and that's what  
17 we're talking about, and that's what you asked for  
18 discovery on.

19 MS. BOYD: I believe that all of  
20 these questions, then, lead to what you allege  
21 caused his visual impairment. So we're not going  
22 to causation, but we're going to how he allegedly  
23 suffered these injuries.

24 MR. KLINGLER: Well, that's  
25 causation, that's not the extent of his injuries,

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1 so you've kind of made my point. I understand why  
2 you want to go there, but that's not --

3 MS. BOYD: How can we discover what  
4 the extent of his injuries are without knowing  
5 what his capacity was before? If a large part of  
6 your damage demand -- or, I'm sorry, request for  
7 damages was based on what his capabilities are now  
8 based on -- as opposed to what they were before,  
9 how is it not important to investigate at what  
10 point that deterioration allegedly occurred?

11 MR. KLINGLER: You can ask him at  
12 what point that deterioration occurred.

13 MS. BOYD: I would like to ask him  
14 more questions than that because I believe that  
15 that level of inquiry is important and is within  
16 the court's order.

17 MR. KLINGLER: I don't, I just don't.  
18 I mean, you're trying to do a full deposition on  
19 causation, on every other issue that might be  
20 relevant, and, I mean, that's not what the court  
21 ordered.

22 MS. BOYD: The extent of his injuries  
23 is not limited to what injuries he suffers today,  
24 that is not what that order says.

25 MR. KLINGLER: You know, I don't know

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1 that it's going to get us anywhere to continue to  
2 argue. I read what I think is pretty clear from  
3 the court's order. I can read it again.

4 MS. BOYD: We've read it.

5 MR. KLINGLER: The way I interpret it  
6 is that what's at issue here is the extent of his  
7 visual impairment, and that's pretty clear, his  
8 visual impairment. It's not the extent of his  
9 pain and suffering that might have occurred at  
10 some other time during his incarceration, it's the  
11 extent of his visual impairment.

12 MS. BOYD: But if I may, the whole  
13 reason the discovery was reopened was to assist  
14 everyone involved in ascertaining what sort of  
15 demand or damages may be appropriate. You're  
16 alleging in your complaint pain and suffering, so  
17 how is that not relevant in determining what is  
18 appropriate?

19 MR. KLINGLER: All I can say is that  
20 the way I understand the judge's order, what is  
21 discoverable at this late date is the extent of  
22 his visual impairment, that's what I understand.  
23 And, you know, in terms of what we all need to  
24 help us settle the case, I don't know, maybe we're  
25 beyond that point; but I'm not going to open up a

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1 full deposition under the theory that it might  
2 help you folks understand the value of the case.  
3 I mean, the extent of his visual --

4 MS. BOYD: That was the point of  
5 discovery being reopened, that was the thrust of  
6 our motion that was granted by the court.

7 MR. KLINGLER: Defendants explained  
8 that, quote --

9 MS. BOYD: You do not need to read it  
10 again.

11 MR. KLINGLER: Factual allegations  
12 concerning plaintiff's abilities and his level of  
13 vision and his level of vision accompanied the  
14 settlement demand that had never before been  
15 brought to their attention. I mean, it's pretty  
16 clear. The medical records make it clear how  
17 much, how often, he had complained, how much pain  
18 he said he was in, so, you know, everybody has  
19 known that. You've known it longer than I have or  
20 the defendants have, so that's not what's on the  
21 table.

22 MS. BOYD: How about this, we will  
23 move to a different line of inquiry, and at the  
24 next break or over lunch, if it gets to that  
25 point, we will discuss how we would like to

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1 proceed.

2 MR. KLINGLER: That's fine.

3 MS. BOYD: How's that sound?

4 MR. KLINGLER: Sure.

5 MS. BOYD: Okay. So I suppose at  
6 this point, I will just ask a question, and if you  
7 believe it's beyond the scope, you let me know.  
8 We'll keep proceeding. Obviously, he won't  
9 answer, if that's the case, and then we'll  
10 determine how best to proceed.

11 MR. KLINGLER: All right.

12 MS. BOYD: Okay.

13 BY MS. BOYD:

14 Q. All right. In 2011, how was your  
15 vision?

16 A. It was good.

17 Q. It was good?

18 A. Um-hmm.

19 Q. Had it been checked since you had  
20 entered into prison in 2010?

21 A. It was checked in CRC before you go  
22 to prison, that was the last time it was checked  
23 until I started seeing triple.

24 Q. Until you started seeing triple?

25 A. Um-hmm.

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1 Q. When was that?

2 A. It was the day that I had lied and I  
3 had told my cellee -- my cell mate to tell the CO  
4 that I just had fell out and somebody needed to  
5 come and get me.

6 Q. When you say I just fell out, what  
7 does that mean?

8 A. Like I had laid on the floor because  
9 I was in so much pain, and I started seeing  
10 triple, so my cell mate had got the CO's  
11 attention. And when the nurses had came, they was  
12 trying to wake me up, and I was hearing them, but  
13 I acted like I didn't because I knew something was  
14 wrong with me. So they took me to the infirmary,  
15 and the nurse had told me, Murray, make this worth  
16 my while -- no, he said make this worth your while  
17 because this is his call, so basically, he wasn't  
18 believing me or whatever. So they took me to the  
19 hospital, and that's when I was diagnosed with --  
20 I thought it was an aneurysm, but they was saying  
21 it was a blood clot on my brain.

22 Q. And this was in February 2012?

23 A. I know it was in the beginning of  
24 2012.

25 Q. Okay. Had you reached out to either

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1 a nurse or a doctor through an HSR prior to that  
2 time?

3 A. Yes. Some days, I would just go to  
4 the infirmary myself without filling out a medical  
5 slip and letting them know like I'm hurting.

6 Q. Okay.

7 A. You know, if I'm coming to you and  
8 I'm crying, I just didn't understand why I  
9 couldn't get the attention that I needed.

10 Q. When you would let them know that you  
11 were in pain, were you treated?

12 A. Yeah. They had put me on a migraine  
13 pill that I guess was supposed to stop my  
14 headaches. They was putting me on all type of  
15 pain medication to try to stop my headaches, but  
16 this wasn't no normal headache. And now that I  
17 know, I know the difference between a migraine and  
18 a headache, that's not the two same things.

19 Q. Did you know that at that time?

20 A. I just knew that I was in worser pain  
21 than a headache.

22 Q. Okay. While you were in the hospital  
23 in February 2012, did they continue your Coumadin?

24 A. Yes.

25 Q. Did they continue to check your INRs?

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1 A. Yes.

2 Q. Did you have surgery?

3 A. Not until the next year.

4 Q. Okay. While you were at the hospital  
5 in February 2012, how was your vision?

6 A. When I had -- after they had seen me  
7 at the beginning of 2012, by the time I got back  
8 to Lebanon, I wasn't seeing triple, I was just  
9 seeing like regular.

10 Q. So your vision had improved from the  
11 time that you went from the hospital back to  
12 Lebanon?

13 A. The day I went to the hospital, I was  
14 seeing triple. When they took me to the hospital,  
15 whatever they had did to me, I could see regular,  
16 I wasn't seeing triple. But then whatever had  
17 happened, I started losing vision, and I'm telling  
18 him this, Dr. Hyde, I'm telling him that my  
19 eyesight is losing. So at sometime that year, he  
20 eventually had sent me to the eye doctor there in  
21 Lebanon, and that eye doctor was saying that I had  
22 some fluid -- I think he said fluid or something  
23 on my optic nerves.

24 Q. When you informed Dr. Hyde that you  
25 were losing your vision, how did you inform him?



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1 A. I just had went over there.

2 Q. You went directly up to him?

3 A. No. I went over to the infirmary and  
4 had told the CO that I needed to see a nurse  
5 because there was something wrong with my  
6 eyesight, and I believe they had put me on the  
7 list to see a nurse or a doctor or something like  
8 that.

9 Q. Okay. You explained earlier that  
10 typically to see a nurse or a doctor, you filled  
11 out a health service request. Was just going up  
12 to the window another way to see a nurse or a  
13 doctor?

14 A. You can, but you're not allowed to.

15 Q. Is that what you did, though?

16 A. Like which time, which time?

17 Q. Whenever you were telling them that  
18 your vision was -- you felt that it was  
19 decreasing.

20 A. Right, right.

21 Q. Tell me about -- when you say your  
22 vision was decreasing, what do you mean?

23 A. Like I can't see far again. Like  
24 certain things, I just can't see no more.

25 Q. Like just things that are far away?

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1 A. Right.

2 Q. Okay. So things in your cell, could  
3 you see those?

4 A. Yes.

5 Q. Okay. Could you see well enough to  
6 read something?

7 A. No.

8 Q. Could you see well enough to write  
9 something?

10 A. No.

11 Q. So you couldn't see far away and you  
12 couldn't see to write?

13 A. Right. Like it would just like --  
14 like blurry, like everything just blurry. Like  
15 you sitting right there, I can't see your features  
16 or your details.

17 Q. Okay. I'm not talking about right  
18 now, though.

19 A. Okay.

20 Q. I'm talking about in 2012.

21 A. Okay.

22 Q. So is that an accurate description of  
23 what your vision was like in 2012?

24 A. Right.

25 Q. Okay. In 2012, you told Dr. Hyde or

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1 you told someone that your vision was going, and  
2 then you went to see someone to treat that; is  
3 that correct?

4 A. Right.

5 Q. Okay. And you're still taking  
6 Coumadin?

7 A. Right.

8 Q. Were you taking Diamox?

9 A. Yes.

10 Q. Okay.

11 A. Yes.

12 Q. And didn't you advise the staff at  
13 OSU that you had not been taking the Diamox as  
14 ordered?

15 MR. KLINGLER: Objection. I'm going  
16 to instruct him not to answer that one.

17 BY MS. BOYD:

18 Q. While you were at OSU when they  
19 discovered the swelling on the brain that you  
20 described, was it explained to you that you needed  
21 to take your medication every day for --

22 A. Yes.

23 Q. -- for it to work?

24 A. Yes.

25 Q. And then I know earlier you said that

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1 you had surgery, but it wasn't until later. Was  
2 that about September 2012?

3 A. I had a few surgeries.

4 Q. Okay. The first of which being in  
5 September; does that sound right?

6 A. I don't remember what month, but I  
7 know they put a shunt in.

8 Q. How was your vision after that?

9 A. Still the same, and I was still  
10 having headaches. So they had took me back to the  
11 hospital to put a valve on the shunt because they  
12 was saying that the shunt was moving too fast. So  
13 they put a valve on it to slow it down, and then I  
14 guess it was slowing down too much, so they just  
15 took the whole thing out, and then I had surgery  
16 on my brain.

17 Q. After that, how was your vision?

18 A. After the surgery on my brain, it's  
19 all been a standpoint since.

20 Q. I'm sorry?

21 A. It's all been a standpoint since.

22 Q. So your vision did not change after  
23 the second surgery?

24 A. No. It's just at a standpoint.

25 Q. Stayed the same?

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1 A. Right.

2 Q. Okay. Now, in December of 2012, do  
3 you recall being assessed by a physical therapist  
4 at the prison?

5 A. A physical therapist?

6 Q. Um-hmm. To determine your level of  
7 independence within the prison.

8 A. No, I don't recall that.

9 Q. Okay. Did you ever need any  
10 assistance while in prison in 2012?

11 A. Like as far as doing what?

12 Q. Your day-to-day tasks.

13 A. No, not for real, because it's  
14 just -- I mean, you shower in your cell, so  
15 everything was compact, so certain senses picks  
16 up. So I can remember certain things that I used  
17 to do when I would be able to see clearly, so I  
18 didn't need no assistance.

19 Q. All right.

20 A. And, plus, at this time, my little  
21 brother was in my cell, my mother's son, so I  
22 didn't need no assistance.

23 Q. And you had told me whenever you  
24 explained your vision that you couldn't see far  
25 away, and writing and reading was difficult, but

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1 you could see things in your cell, it was just  
2 blurry --

3 A. Right.

4 Q. -- is that accurate?

5 A. Um-hmm.

6 Q. So you could still see?

7 A. Um-hmm.

8 MR. KLINGLER: Object to the form of  
9 the question, you could still see.

10 BY MS. BOYD:

11 Q. You could make out objects in your  
12 cell, yes or no?

13 A. Yes.

14 Q. Let's see. Do you recall, was your  
15 vision assessed while you were in prison after  
16 these surgeries to determine what your vision was?  
17 I know you said it was 20/20 when you first  
18 entered. Was it reassessed?

19 A. Okay. Is you saying like did they  
20 take me to OSU and check my vision?

21 Q. Yeah. Take you to OSU or take you to  
22 anywhere to determine what your vision or your  
23 prescription was now?

24 A. Yes. They took me to OSU, and  
25 whatever they had told the prison, I don't know,

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1 because OSU is not allowed to discuss with you  
2 your medical record. They discuss it with the  
3 doctors at Lebanon, and then Lebanon tells you so  
4 much.

5 Q. Okay. Were you given glasses?

6 A. Yes, but it was like a magnifying  
7 glass.

8 Q. What do you mean?

9 A. Like the glasses is a magnifying,  
10 like if I needing to see something up close like  
11 to read something or to write something.

12 Q. Were they reading glasses?

13 A. There's a difference. You know, like  
14 a magnifying glass and reading glasses, them ain't  
15 the same two.

16 Q. So they were prescription eyeglasses?

17 A. Yes.

18 Q. Okay. Were you given glasses in  
19 August of 2013?

20 A. August 2013? I can't recall when I  
21 had got them glasses.

22 Q. Okay.

23 A. I don't know what month.

24 Q. Was there an optical lab at the Ohio  
25 Reformatory for Women that you ever went to?

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1 A. Excuse me?

2 Q. At ORW, the Ohio Reformatory for  
3 Women, was there an optical lab there that you  
4 ever went there?

5 A. Women?

6 Q. At ORW, did they have a vision center  
7 that they would sometimes take you guys to if you  
8 needed your vision checked?

9 A. When was I there? I don't know what  
10 that is. Is that a medical center?

11 Q. I don't know. I'm asking you if you  
12 ever recall going there for such a visit?

13 A. No, no.

14 Q. Okay. But you did have your vision  
15 checked while you were in prison?

16 A. Yes.

17 Q. And they gave you glasses?

18 A. (Nodding head.)

19 Q. If I told you that in August of 2013  
20 that your vision was a plus 4 in each eye, does  
21 that sound like something that would have been  
22 relayed to you?

23 A. I don't know what a plus 4 is.

24 Q. Okay. Whenever they would give you a  
25 prescription or give you new glasses, would they



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1 have you sign that sheet to state that you were  
2 aware?

3 A. I don't know.

4 Q. Okay. If I had a form indicating  
5 that you did sign, would you be able to confirm  
6 that it is your signature?

7 A. No. If I can -- I have to do it like  
8 this. Wait.

9 MS. BOYD: While he's getting that,  
10 may I steal an exhibit sticker.

11 THE WITNESS: Let me see the paper.

12 (Thereupon, Defendant's Exhibit No.  
13 1, a document dated August 2013, was marked for  
14 purposes of identification.)

15 BY MS. BOYD:

16 Q. I'm handing you what I have just  
17 marked as Defendant's Exhibit 1.

18 A. Where is the signature at so I know  
19 where to look at?

20 Q. It's about halfway down the page.

21 A. Just point to it.

22 MR. KLINGLER: (Indicating.) You  
23 want his signature?

24 MS. BOYD: Yes.

25 MR. KLINGLER: (Indicating.)

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1 THE WITNESS: That's my signature.

2 BY MS. BOYD:

3 Q. Okay. And if you look just a little  
4 bit further up on the page, it shows that your  
5 prescription in each eye was plus 4.

6 MR. KLINGLER: (Indicating.)

7 THE WITNESS: Okay.

8 BY MS. BOYD:

9 Q. Okay. Does that seem accurate as  
10 about what you recall your vision being in August  
11 of 2013?

12 A. No, I don't recall it.

13 Q. But they gave you glasses?

14 A. Magnifying, yes.

15 Q. Okay. Now, if I were to tell you  
16 that you saw the same optical lab again in June of  
17 2014, would you have any reason to disagree with  
18 that?

19 A. In when, 2000 and what?

20 Q. '14, does that sound about right?

21 A. I probably did, I just don't know.

22 Q. That's okay. I'm going to hand you a  
23 similar sheet again that shows that you were seen  
24 on June 11th, 2014, this time showing that the  
25 prescription in your right eye was plus 1.25 and

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1 the prescription in your left eye was plus 1.5.

2 There's also a notation for your signature again.

3 (Thereupon, Defendant's Exhibit No.  
4 2, a document dated 6/11/2014, was marked for  
5 purposes of identification.)

6 BY MS. BOYD:

7 Q. I'm handing Defendant's Exhibit 2 to  
8 you and a copy to your attorney.

9 MS. BOYD: Mr. Kingler, if you  
10 wouldn't mind just helping him verify that again.

11 MR. KLINGLER: You see there, I guess  
12 that's it. (Indicating.)

13 THE WITNESS: That's my signature?  
14 That's my signature?

15 MR. KLINGLER: That's the question.  
16 Do you think it is your signature?

17 THE WITNESS: No, not that one  
18 because I write -- hold on. Let me see this.  
19 Where's my first name at?

20 MR. KLINGLER: It's not on there.

21 THE WITNESS: Oh, I write way  
22 sloppier than this.

23 BY MS. BOYD:

24 Q. Let me ask you this, did you receive  
25 a different pair of glasses whenever you went to

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1 Pickaway?

2 A. I don't recall.

3 Q. Okay. Because this sheet seems to  
4 indicate that your prescription got better,  
5 meaning that your eyesight got better, and that  
6 you were given new glasses in June of 2014. Do  
7 you have any reason to dispute that?

8 A. Yes, because I don't remember that, I  
9 don't.

10 Q. Did you have glasses while you were  
11 at Pickaway?

12 A. I know I had the magnifying glasses,  
13 which didn't help, so yes, I had glasses.

14 Q. So from the time that you first got  
15 glasses -- do you recall, was it in 2012 or 2013?

16 A. I don't recall.

17 Q. Okay. From the time you first got  
18 glasses, did you have glasses the whole time that  
19 you were in prison?

20 A. No.

21 Q. No?

22 A. (Shaking head.)

23 Q. Why not?

24 A. Because when I got to prison, I  
25 didn't need glasses.

1 Q. No, I understand that. I mean,  
2 starting in 2012 or 2013, you said you can't  
3 recall when you got them. Say you got them in  
4 2012. From then until you were released from  
5 prison, did you have glasses the entire time?

6 A. Yes, yes, I did.

7 Q. At any point during that time between  
8 2012 to 2014, did your vision get better?

9 A. No.

10 Q. Did your vision get worse?

11 A. It's at a standpoint. After I had  
12 that surgery on my brain, my vision never got  
13 worser and it never got better.

14 Q. Okay. So this sheet that I just  
15 showed you shows that your prescription got  
16 better. Are you saying that that's inaccurate?

17 A. Yes.

18 Q. Are you disputing that you were seen  
19 by an ophthalmologist or optometrist?

20 A. I was seen by one, but I can't  
21 remember when.

22 Q. Okay. You mentioned earlier that you  
23 were told on many occasions the importance of  
24 taking your Coumadin?

25 A. Yes.

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1 Q. And the importance of getting your  
2 INR levels checked?

3 A. Yes.

4 Q. Was there ever a point while you were  
5 in prison that you refused medications?

6 MR. KLINGLER: Objection, don't  
7 answer.

8 BY MS. BOYD:

9 Q. Was there ever a point while you were  
10 in prison that you refused to have your INR levels  
11 checked?

12 MR. KLINGLER: Objection, don't  
13 answer.

14 BY MS. BOYD:

15 Q. Just to be clear, you said your  
16 vision stayed the same, so in 2014, you could see  
17 shapes; is that correct?

18 A. Yes.

19 Q. Could you make out people's faces?

20 MR. KLINGLER: Object to the form.  
21 You can answer.

22 BY MS. BOYD:

23 Q. Could you make out -- go ahead.

24 A. If they was up close to me, yes.

25 Q. Could you read?

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1 A. No.

2 Q. Could you write?

3 A. No.

4 Q. Even with your glasses on?

5 A. No.

6 Q. How --

7 A. They didn't work. That's what I was  
8 getting to, they gave me some glasses that -- what  
9 am I supposed to do with these? I don't know.

10 Q. Okay. Were you ever unable to be  
11 independent while you were in prison?

12 MR. KLINGLER: Object to the form.

13 THE WITNESS: No, because like I say,  
14 certain senses pick up, so I can still wash my  
15 behind, and I can still eat, and that's basically  
16 what I was doing.

17 BY MS. BOYD:

18 Q. Could you still get around the  
19 prison?

20 A. When I was in Pickaway?

21 Q. When you were in Lebanon and then  
22 when you were in Pickaway.

23 A. Well, in Lebanon, yes, and in  
24 Pickaway; but Pickaway, I was in a wheelchair, so  
25 I didn't go nowhere. I mean, I was in like a

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1 little hospital, so there was nowhere to really  
2 go.

3 Q. Why were you in a wheelchair while  
4 you were in Pickaway?

5 A. Because I had a stroke and I couldn't  
6 feel my right leg.

7 Q. Did that have any affect on your  
8 vision?

9 A. Not that I recall. I don't recall.

10 Q. Okay.

11 A. I don't think so because, like I say,  
12 after I had that surgery, it was at a standpoint.

13 Q. Since your release from prison on  
14 December 7th, 2014, what type of medical care have  
15 you received?

16 A. Medicaid.

17 Q. Just what type of care, did you go to  
18 an eye doctor?

19 A. Yes, when I first got home, yes, I  
20 did.

21 Q. Okay. What did that eye doctor say?

22 A. I don't remember what level he put my  
23 vision at, but I know I had went to Social  
24 Security, and they had sent me to they eye doctor,  
25 and they determined that I should get SSI. I



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1 don't know, I don't know the levels of what my  
2 eyesight is, but I can tell you what I can see, I  
3 can tell you what I can't see.

4 Q. What eye doctor did you go to?

5 A. Well, when I had went from Social  
6 Security or when I had went to Ohio State?

7 Q. When did you --

8 A. I mean, not Ohio State. University,  
9 that's the hospital that I go to now, University.

10 Q. University Hospital?

11 A. Yeah, in Cincy, yeah.

12 Q. What doctor do you see at University  
13 Hospital?

14 A. I don't remember his name because I  
15 seen him in 2015, and when he had told me there  
16 wasn't nothing he can do about my eyesight, I  
17 never have been back.

18 Q. Did he tell you to come back for a  
19 follow-up?

20 A. Yeah, just to see if it gets worser,  
21 but I didn't because it ain't got no worser and it  
22 ain't got no better.

23 Q. Just to be clear, you went to  
24 University Hospital to an eye doctor in 2015?

25 A. Yes.

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1 Q. He told you to come back for a  
2 follow-up?

3 A. Yes.

4 Q. And you chose not to?

5 A. Yes.

6 Q. Okay. Did you see any other eye  
7 doctors -- and you don't recall the name of that  
8 eye doctor?

9 A. I seen -- I don't know the name of  
10 the eye doctor. I just know Social Security had  
11 sent me to their eye doctor.

12 Q. At University Hospital or a different  
13 eye doctor?

14 A. A different eye doctor.

15 Q. Do you know the name of the practice?

16 A. No. I just know that they determined  
17 that I was partially blind.

18 Q. When was this that you saw that eye  
19 doctor?

20 A. Sometime in 2015. It was like --  
21 because I had filed for SSI when I first came  
22 home, so I just don't remember, I don't remember  
23 what month they had sent me, but I know I had to  
24 go see their eye doctor.

25 Q. Was that before or after you saw the

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1 eye doctor at University Hospital?

2 A. I believe that was before.

3 Q. Okay. Did the eye doctor that SSI  
4 referred you to give you any sort of instructions  
5 as to what you should do or tell you more about  
6 your vision?

7 A. Not that I recall.

8 Q. Okay. Did they tell you to come back  
9 for a follow-up?

10 A. Not them because they didn't need to  
11 follow up with me.

12 Q. So that was just to assess your  
13 vision for SSI?

14 A. Right.

15 Q. Okay. I understand. Since 2015,  
16 have you been to any eye doctor?

17 A. No. Since after that one from  
18 University?

19 Q. Um-hmm.

20 A. No.

21 Q. Have you been to any other doctor?

22 A. I see my doctor like every 90 days.

23 Q. Have you had any additional  
24 surgeries?

25 A. No.

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1 Q. What do you see the doctor for every  
2 90 days?

3 A. Because I'm on Xarelto, and -- I'm on  
4 medication, basically.

5 Q. Okay. What is the name of this  
6 doctor?

7 A. Michael Binder.

8 Q. Did you say Biter or Binder?

9 A. Binder, Binder.

10 Q. Okay. Is he affiliated with a  
11 hospital or a specific practice?

12 A. He's affiliated with the hospital.

13 Q. University Hospital?

14 A. University, yeah.

15 Q. So do you go to University Hospital  
16 to see him?

17 A. Yes.

18 Q. And for what are you seeing him?

19 A. To manage my medication. I'm on  
20 medicine, so I have a health problem, so I go to  
21 him, and they check my blood pressure, and they  
22 check my heartbeat, and they check me. I mean,  
23 it's I guess a follow-up or whatever you call it,  
24 but I take medications, so somebody has to  
25 prescribe them medications.

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1 Q. And is all of this addressing the  
2 blood clots?

3 A. Yes, because they feel like that I  
4 should be on a blood thinner for the rest of my  
5 life.

6 Q. You mentioned Xarelto. What other  
7 medications are you on?

8 A. Metoprolol, lisinopril, aspirin,  
9 Xarelto. I might still have the list in my pocket  
10 or my wallet. I'm not for sure or not. What is  
11 all of this?

12 MR. KLINGLER: No, that's nothing.

13 THE WITNESS: That don't have my  
14 medicines on it?

15 MR. KLINGLER: No.

16 THE WITNESS: Well, offhand, the only  
17 ones I know of is the Xarelto, lisinopril,  
18 metoprolol, and aspirin, and I'm taking another  
19 one, but I can't think of the name of it.

20 BY MS. BOYD:

21 Q. Do you still take Coumadin?

22 A. No, no.

23 Q. When did you stop taking Coumadin?

24 A. 2014, when I was in prison.

25 Q. Okay. Did you take anything in its

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1 place?

2 A. Yes, Lovenox.

3 Q. Are you still taking Lovenox?

4 A. No. They switched me to Xarelto  
5 because who wants to stab themselves twice a day for  
6 the rest of their life.

7 Q. Other than Dr. Binder, is there any  
8 other doctor that you've seen since your release  
9 from prison in addition to the two eye doctors  
10 that you mentioned?

11 A. Yes. I see a blood doctor. What's  
12 the name for the blood doctor, hema --

13 MR. KLINGLER: Hematologist.

14 THE WITNESS: Right.

15 BY MS. BOYD:

16 Q. Do you know the hematologist's name?

17 A. No, not offhand, I don't. I've got  
18 it on a piece of paper at the house, but I don't  
19 know the name by heart.

20 Q. Is this someone that you were  
21 referred to by Dr. Bender?

22 A. Binder.

23 Q. Binder, excuse me.

24 A. Yes, to see -- yes, yes.

25 Q. What is the hematologist doing for

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1 you that Dr. Binder isn't; what's the purpose of  
2 going to the hematologist?

3 A. Oh, for my -- to try to figure out  
4 why did I have -- what's the reason of me having  
5 blood clots.

6 Q. Okay. So they're still not totally  
7 under control?

8 A. I mean, it's under control now, but  
9 what's the reason, what's the reason why.

10 Q. Okay.

11 A. And when I was in prison, they had  
12 mentioned something about low protein C, low  
13 protein S, but since I been home, they told me  
14 that I don't have that. So what's the reason,  
15 then?

16 Q. How often do you see this  
17 hematologist?

18 A. Like every six months.

19 Q. Okay. So you see Dr. Binder every 90  
20 days, the hematologist every six months?

21 A. (Nodding head.)

22 Q. Yes or no?

23 A. Yes.

24 Q. Sorry. The head nods she can't pick  
25 up on.

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1 A. Okay, okay. Yes.

2 Q. And you saw an eye doctor at  
3 University Hospital who told you to come back, but  
4 you have not gone back?

5 A. Because he told me that he couldn't  
6 fix my eyesight, so what's my reason for coming  
7 back there.

8 Q. Did he tell you to come back?

9 A. Yes, he did.

10 Q. Okay. How do you get to these  
11 doctors' appointments?

12 A. The bus.

13 Q. The bus?

14 A. (Nodding head.)

15 Q. Where are you living now?

16 A. Evanston in Cincinnati.

17 Q. That's right. You said that, I'm  
18 sorry.

19 Who are you living with, anyone?

20 A. Me, currently, right now, because my  
21 girlfriend is going back home because her mother  
22 is sick, but she's with me, but she's not there  
23 now.

24 Q. Is this girlfriend a different woman  
25 from whom you were living with before?



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1 A. Yeah. This is somebody who I met out  
2 in Denver.

3 Q. Okay. Do your sons live with you?

4 A. No.

5 Q. Where do they live?

6 A. With they mother.

7 Q. Where?

8 A. Downtown Cincinnati.

9 Q. Okay. How far is that from where  
10 you're at?

11 A. Mileage or time or how?

12 Q. Time, how long does it take?

13 A. If I get on a bus, about 25 minutes.

14 Q. Okay. Do you get on the bus to go  
15 see them?

16 A. No. They come see me.

17 Q. How often do they come see you?

18 A. I would say like twice a month.

19 Q. Is that something that's arranged or  
20 why twice a month?

21 A. Because, you know, like they have  
22 school. Like my oldest son, he works, and he  
23 plays football, and he's got summer school, so his  
24 schedule is consisting on what he have to do. My  
25 youngest son, he's a mama's boy, so he would

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1 rather be with his mother. And seeing how -- I  
2 feel like they feel like that since I'm not able  
3 to really go out and do things with them, they  
4 don't want to be around me for real, but they love  
5 me, but it's like they don't want to see me like  
6 this.

7 Q. Would you say your relationship with  
8 them has changed since you've gotten out of prison  
9 this last time?

10 A. Yes, yes.

11 Q. While you were in prison from 2010 to  
12 2014, did you maintain a relationship with them?

13 A. Yes.

14 Q. Did they come see you?

15 A. Yes.

16 Q. How often?

17 A. Well, they came to see me once, and  
18 that was because my kids -- my kids' mother had  
19 brought them up there.

20 Q. Okay. So they came to see you once  
21 in the four years that you were most recently  
22 incarcerated?

23 A. Right.

24 Q. Okay. Do you call them on the phone?

25 A. Yes.

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1 Q. How often?

2 A. Maybe once a week.

3 Q. Okay. You said that they don't like  
4 being around or your relationship has changed?

5 A. Um-hmm. Because, to me -- I mean, to  
6 them, I am boring, I'm boring for a normal  
7 teenager, because I don't want to do nothing. I  
8 want to lay in the bed. They want to go here and  
9 go there.

10 Q. Could you do things?

11 A. I could if I pushed myself, but my  
12 body hurts so much that I don't want to do  
13 nothing.

14 Q. When you say your body hurts, what do  
15 you mean?

16 A. Due to that stroke and the pain that  
17 I had suffered, and it's still there.

18 Q. So you don't feel motivated to do  
19 things because your body hurts?

20 A. Right.

21 Q. Not because it's more difficult for  
22 you to see?

23 A. No, that, too, because like I don't  
24 want to go to no football practice or nothing  
25 because I don't even know where you at out there.

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1 So that hurts, you know, not being able to see  
2 what my son is doing, see if he can catch the ball  
3 or see if he can run through tackles or whatever  
4 he's doing.

5 Q. You told me before that you could see  
6 shapes?

7 A. Yes, I can see shapes.

8 Q. So would you be able to see the  
9 shapes on the football field?

10 A. Yeah, that depends on if I'm down  
11 there on the field, but if I'm in the stadium,  
12 it's too far, so it's going to get more blurrier.

13 Q. But if you were close down right by  
14 the sidelines, would you be able to make out the  
15 shapes of what was going on in the game?

16 A. Yeah, yes, yes.

17 Q. Do you think it would mean a lot to  
18 your son if you were there?

19 A. It probably would, yes.

20 Q. Okay. But you choose not to go?

21 A. Yes.

22 Q. Okay. What about your younger son,  
23 is he involved in anything like that?

24 A. Well, he don't have to go to summer  
25 school. So he was going to school over in

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1 Kentucky, but he was running track.

2 Q. When you say was, is that in the last  
3 few years?

4 A. No. This is this past school year.

5 Q. Okay. Did you ever go to any of his  
6 track meets?

7 A. No.

8 Q. Could you have?

9 A. I'm pretty sure, yes.

10 Q. Could you have taken the bus?

11 A. I don't know my way to --

12 Q. To Kentucky?

13 A. Right.

14 Q. But you could have gone?

15 A. I could have got there, yes.

16 Q. Okay. But you chose not to?

17 A. Yes.

18 Q. Okay. How long has your son been  
19 playing football, your oldest son? You said he's  
20 17 now.

21 A. He's been playing football since he  
22 was like 14.

23 Q. So that would have been five years,  
24 so that was while you were incarcerated the most  
25 recent time?

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1 A. Yes.

2 Q. Okay. Did he ever have any other --  
3 like did he play Little League sports or anything  
4 whenever he was much younger?

5 A. Yes. Well, he had started playing  
6 Little League. He played for the Cincinnati  
7 Eagles before he played football in -- before he  
8 played football in regular school.

9 Q. Did you go to any of those games?

10 A. I was locked up.

11 Q. Okay. I know you said that you went  
12 to SSI. Have you tried to -- or have you gotten  
13 benefits?

14 A. Yes. They gave it to me as soon as I  
15 came out.

16 Q. In 2014?

17 A. After they sent me to they eye  
18 doctor, they put me on SSI.

19 Q. Okay. Before you went to get SSI,  
20 did you ever think about seeking employment?

21 A. To do what?

22 Q. Get a job.

23 A. I know, but doing what?

24 Q. Well, I'm asking, did you ever try?

25 A. No, no.

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1 Q. Do you believe that you would be able  
2 to hold down a job?

3 A. No, no.

4 Q. Why?

5 A. Doing what? I can't stand on my feet  
6 very long. I can barely see. So doing what?

7 Q. Okay. So due to the physical effects  
8 of your stroke, it would be difficult for you to  
9 work?

10 A. And my eyesight, yes.

11 Q. But not solely because of your  
12 eyesight?

13 A. Not what?

14 Q. Not solely because of your eyesight?

15 A. I don't understand what you're  
16 saying.

17 Q. That it's a combination of the  
18 physical effects from your stroke and your  
19 diminished eyesight that makes you believe that  
20 you would be unable to work; is that accurate?

21 A. Right, meaning that -- meaning  
22 because of my eyesight and because of my physical,  
23 that's the reason why I believe that I can't work.

24 Q. Together?

25 A. Yes.

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1 Q. Okay. But you've never tried to find  
2 a job?

3 A. No.

4 Q. Okay.

5 A. Because I do know.

6 Q. And you got disability pretty much as  
7 soon as you got out of prison?

8 A. Yes, yes, and I'm still on it.

9 Q. So you're able to support yourself  
10 through that?

11 A. Somewhat.

12 Q. What do you mean by somewhat?

13 A. Because if I'm cooking on the stove,  
14 I have to be so close to the skillet, so I might  
15 get popped. So I have to turn it all the way -- I  
16 have to cook things longer. I won't put it on  
17 high. I will put it on low, so, therefore, I  
18 don't get grease popped out on me or whatever.

19 Q. But you're still able to cook for  
20 yourself?

21 A. Yes.

22 Q. Okay. And you indicated that you can  
23 take the bus places?

24 A. Yes, that's because now the bus, it  
25 speaks, like the bus speaks now, so the bus --



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1 like the bus tells you where you at.

2 Q. Okay.

3 A. Since I'm from Cincinnati and the  
4 places that I go, I kind of know where they at, so  
5 if the bus telling me you on William Howard Taft  
6 or wherever I'm at, that bus speaks to you now.

7 Q. Okay.

8 A. And if I need help, I just ask the  
9 bus driver can you let me off at this stop.

10 MS. BOYD: Take a very quick break.

11 MR. KLINGLER: Sure.

12 (Brief recess.)

13 BY MS. BOYD:

14 Q. Mr. Murray, since you were released  
15 from prison in 2014, have you attempted to enroll  
16 in any GED classes?

17 A. No.

18 Q. Okay. Have you had to make any  
19 improvements or changes to your home?

20 A. I just have everything where I know  
21 where everything is at, so that's the change,  
22 yeah, to put everything where I know where it's  
23 at.

24 Q. Do you need any assistance to get  
25 around because of your vision, such as a cane or a

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1 seeing eye dog or anything like that?

2 A. I use my cane, but -- that one I do,  
3 but when I had went to -- since I've been home, I  
4 went to -- it's called the blind association, and  
5 they had wanted me to use the walking cane,  
6 because when I walk, I normally look down so I  
7 don't trip, but they want me to learn how to walk  
8 with my head up and use that cane.

9 Q. Okay.

10 A. But like I told them, like I don't  
11 want this because I feel like people -- when  
12 certain people see certain things like that, they  
13 try to take -- they try to take advantage over  
14 you. So if somebody trying to take advantage of  
15 me because I got this cane, I'm going to try to  
16 hit them with it, just keeping it real, so I don't  
17 want it. Then, they asked me about public places,  
18 and, well, yeah, I can use it in public, yes, I  
19 can, but stuff happens in public places. So I  
20 don't want nobody to look at me like I can't  
21 defend myself, because if I had this cane and if  
22 somebody trying on me, I am going to swing it.

23 Q. When you say cane, you mean the  
24 walking stick with the tip on it?

25 A. Right. So I just got my own type of

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1 cane.

2 Q. And is that cane to assist you with  
3 walking because of your stroke?

4 A. Yes.

5 Q. Okay. Because you said that you --  
6 I'm sorry, go ahead.

7 A. Oh, because I use it for distance, I  
8 use it for distance, because like I can walk down  
9 the street, and the longer I walk, the more my leg  
10 hurts, but a short distance, it don't really  
11 bother me, but long distance, that's what bothers  
12 me.

13 Q. So for short distances, do you need  
14 your cane?

15 A. No, like walking from here to there  
16 or the bathroom, no, no.

17 Q. You can see your way if you just look  
18 down at the floor?

19 A. You know what, that's a good  
20 question, because it's like I just use that so I  
21 don't trip because I don't want to trip over  
22 nothing. Like if I can see regular, then, it  
23 would be different because when you can see  
24 everything, like when you can see down and up and  
25 straight at the same time, then, that's different.

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1 But I have to put my focus on how I can see it.

2 Like do that make sense to you?

3 Q. Well, let me ask further. So normal,  
4 you're saying if you could see normal, you would  
5 be able to see down, up, and straight at the same  
6 time?

7 A. Right. You would be able to actually  
8 really see. I mean, it's just different for me  
9 now. I just kind of like walk with my head down.

10 Q. Why do you do that?

11 A. Because it helps me to get to where  
12 I'm going, I guess. I don't know.

13 Q. What part of the down, up, and  
14 straight can't you see?

15 A. Everything is blurry. Nothing is  
16 clear to me unless it's like this. (Indicating.)

17 Q. Okay. And you're holding that cup  
18 about 6 or 8 inches from your face?

19 A. Yes. (Indicating.) But now, I can't  
20 see this writing. Just like I was explaining to  
21 this lady right here, when I use my phone, it's  
22 pretty cool because -- (indicating). So I can be  
23 able to see certain things, that's how I use that.

24 Q. Okay.

25 A. Or I can put it on the talk-back, but

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1 I can't stand that because it's the lady and say  
2 you press 2, and I just don't like that.

3 Q. Don't like the voice?

4 A. I'd rather do it for myself.

5 Q. You just showed me on your phone how  
6 you can enlarge things on your phone so you can  
7 see things on your phone?

8 A. Right.

9 Q. So are you able to use your phone  
10 just like anyone else would be able to by  
11 enlarging it?

12 A. Yes.

13 Q. Okay. Aside from your phone and your  
14 cane that you use to help you walk since you get  
15 tired from the stroke, is there anything else that  
16 you do differently than you did before you went to  
17 prison?

18 A. I can't run, I know that. That I do  
19 different? Well, I do need help washing because  
20 that's hard for me.

21 Q. Why is that hard for you?

22 A. Because, you know, now you got these  
23 new machines where you can use a card and type in,  
24 you've got to type in, that's hard. Like it's  
25 like you put the money on a card. Like if I was

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1 to go to the Laundromat, I'd have to take somebody  
2 with me, because you have to put money on the  
3 card, and you put the card in the machine, and  
4 whatever they do or whatever. I don't know how to  
5 do it.

6 Q. Okay. It's different than before you  
7 went to prison?

8 A. Right. Before I went to prison, you  
9 just put coins in it.

10 Q. You said that you have SSI?

11 A. Um-hmm.

12 Q. So have you had to pay anything out  
13 of pocket for any of your medical or eye expenses?

14 A. No. The Medicaid -- before I left  
15 prison, I don't know how it happened, but I was on  
16 Medicaid. I didn't know how, because when I came  
17 home from prison, I called signing up for it, but  
18 they told me I was already on it. I didn't sign  
19 me up for it, so I guess the prison had signed me  
20 up for it.

21 MS. BOYD: All right. Maureen, any  
22 questions?

23 MS. YUHAS: No, no.

24 MS. BOYD: That's all of the  
25 questions we have. Mr. Klingler, we do have some

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1 medical releases that we're hoping Mr. Murray  
2 would sign for some of the medical records that he  
3 discussed.

4 MR. KLINGLER: We can do that off the  
5 record. You're finished with your questions?

6 MS. BOYD: We are finished.

7 MR. KLINGLER: Jamal, I didn't tell  
8 you this, but I'm going to ask you a few  
9 questions, if that's okay, to clear a couple of  
10 things up or to make sure some things are clear.  
11 Is that all right?

12 THE WITNESS: Um-hmm.

13 EXAMINATION

14 BY MR. KLINGLER:

15 Q. All right. So Ms. Boyd asked you if  
16 you can use your phone just like anyone else, and  
17 I think you said yes, if you magnify it. Could  
18 you -- can you read things on the phone?

19 A. Yes, but it has to be big.

20 Q. Can you just pull it out again and  
21 just show us how you read something on the phone?  
22 Like do you ever get text messages from anybody?

23 A. Yes.

24 Q. So maybe you could pull up a text  
25 message or something and show us what you do to

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1 read a text message.

2 A. As a matter of fact, that's my son  
3 right here, he just texted me. He said: Good  
4 morning, pops, I ain't forget about you, I  
5 promise. I just been very busy and tired. I  
6 ain't really had time to call or nothing like  
7 write. I'm in summer school. I know that. Then  
8 right after this: I got to go to work.

9 Q. Okay. That's D [REDACTED]?

10 A. D [REDACTED], yeah.

11 Q. Yeah. Okay.

12 A. (Indicating.)

13 Q. So that's how you read a text?

14 A. Um-hmm. Now, how do I respond?

15 Q. Yeah. How do you respond?

16 A. I just speak it. I know to go here  
17 and I know to push this right here, I know to push  
18 this. So I just speak my text, and then after I  
19 speak it, just to make sure that it's right, I  
20 blow it up so I can read my text and make sure  
21 that they have spelled everything right.

22 Q. I've gotcha. Okay. So that takes a  
23 little while I guess?

24 A. Right.

25 Q. Let me ask you about taking the bus.



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1           A.    Like I say, well, it's only really  
2 one bus that I really ride, and that's No. 4,  
3 because it comes in front of my house. But since  
4 I kind of know my city and wherever I am going,  
5 like I say, if I need help, I just ask the bus  
6 driver. Sometimes like the bus speaks, like it  
7 tell you like Route 4 or whatever, so sometimes  
8 the bus don't tell you every stop, so I have to  
9 get up and go ask the bus driver like is we  
10 getting close to this certain stop or did I pass  
11 this certain stop.

12           Q.   When you're on the bus, can you see  
13 enough of the buildings or the neighborhood or  
14 whatever to know where you're at?

15           A.   Somewhat, somewhat, somewhat. It all  
16 depends on where I'm at. Like if I'm riding  
17 downtown or if I'm riding through Avondale,  
18 certain neighborhoods, I just remember.

19           Q.   Because you've been there before?

20           A.   Right. So like if I'm -- just say,  
21 for instance, if I'm on Burnet, then, I know that  
22 this is the hospital, this is University Hospital,  
23 and I know next to it is Children's. But farther  
24 on down, they done switched up so much stuff, that  
25 I know that this is Burnet, but I don't know these

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1 stores, I don't know, because it's so much  
2 switched up.

3 Q. Coming from the street, could you  
4 read like a sign on the building that says what it  
5 is?

6 A. Oh, if it's real big, yeah, yeah, if  
7 it's real big.

8 Q. Okay. You said you've been to the  
9 City of Cincinnati Association for the Blind and  
10 they suggested that you have a walking cane or  
11 something?

12 A. Right.

13 Q. Did they have any suggestions for  
14 reading?

15 A. Yes. It's this machine, but it  
16 costs. I would say it's something like this,  
17 (indicating), but, basically, all it is is like  
18 how -- it's kind of like the same thing, like with  
19 my -- basically, it's like this, like how my  
20 screen in the back is darker than my numbers is  
21 like. (Indicating.)

22 Q. Okay.

23 A. But, see, anybody can remember 1, 2,  
24 3, 4, 5, so that's easy, so that's how I know how  
25 to use that, that's easy, but it makes me see it

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1 better.

2 Q. That's what the machine was going to  
3 do?

4 A. Right.

5 Q. Did you get the machine?

6 A. Huh-uh.

7 Q. Would the machine make it easier for  
8 you to read?

9 A. Yes, it would.

10 Q. Why didn't you get it?

11 A. Because it was a cost, it was a  
12 price, and I didn't have it. The Medicaid, they  
13 wouldn't pay for that.

14 Q. All right. Can you watch TV?

15 A. Up close, yeah, not laying in my bed.

16 Q. Can you watch football games on TV?

17 A. Yes, up close, if I'm sitting in  
18 front of the TV like this and if it's a big TV  
19 like the one I got at my house. I have to sit at  
20 the edge of my bed to watch it.

21 Q. Like how close do you have to be to  
22 the screen, if you could show us with your hands  
23 or with something else?

24 A. (Indicating.) I would say from right  
25 here to like right here, I'd have to be like right

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1 there watching it. But, you know, like how like  
2 seeing the score, I would have to get up on the TV  
3 and then look at it like real close, like this and  
4 look at the score. (Indicating.) As far as like  
5 seeing them, I can see that, but I wouldn't be  
6 able to see they numbers on they jerseys or  
7 whatever, but I would be able to see them playing.  
8 Like if I really wanted to see them like kick the  
9 ball or something like that, I would have to be up  
10 on it like this to actually see it like that. But  
11 if the TV is right there, I can pretty much see  
12 what I need to see from that angle.

13 Q. All right. You said something about  
14 cooking earlier or you answered some questions  
15 about cooking. Has anybody ever told you that  
16 they thought it was dangerous for you to cook?

17 A. It is because -- yeah, yeah.

18 Q. Who told you that?

19 A. My mom, my girlfriend, they tell me  
20 that I should get a home provider, but I just --  
21 you know, I just try to do it on my own. Like,  
22 you know, I use my microwave. I was taught how to  
23 use it, so I know how to use it. But with like  
24 using the stove, that's dangerous because I done  
25 been popped a few times, but I just do it.

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1 Q. Did anybody ever find some dangerous  
2 situation with your stove when they were with you?

3 A. Oh, yeah. It was real, real smokey  
4 because I had dropped some -- I had dropped some  
5 grease in the top, on top, yeah.

6 Q. And it got real smokey, and did it  
7 catch on fire or something?

8 A. And I had caught myself using water,  
9 but they had told me next time if that was to  
10 happen to use soap. I didn't know that. I caught  
11 myself putting it out with water, but I got it  
12 out, though.

13 Q. How often do you go out by yourself  
14 to do anything?

15 A. I walk to the store, and the store  
16 is, you know, across the street.

17 Q. Okay. Where else do you go by  
18 yourself?

19 A. Nowhere. I go to the store, but  
20 that's close. I came down here by myself, but  
21 pretty much, I just be in the house pretty much.  
22 I don't really have too many friends no more,  
23 which don't bother me one bit.

24 MR. KLINGLER: All right. That's all  
25 I've got. Thanks.

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1 MS. BOYD: No, we don't have any  
2 follow-up. We just note that we would reserve the  
3 right to get further clarification from the judge  
4 on the order, if we determine that that would be  
5 appropriate, and continue the deposition, if  
6 necessary, but as of right now, we are good to go  
7 aside from, of course, eliciting more of the  
8 medical information that we talked about to get  
9 the releases done.

10 MR. KLINGLER: All right. We can  
11 talk about that and go off the record, then, I  
12 guess.

13 MS. BOYD: Okay.

14 MR. KLINGLER: If it's transcribed,  
15 we'll take signature.

16 (Thereupon, the deposition was  
17 concluded at 12:33 p.m.)

18 \* \* \*

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I, JAMAL ANTONIO MURRAY, do hereby  
certify that the foregoing is a true and accurate  
transcription of my testimony.

Dated

Job: 180615LMCY

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1 STATE OF OHIO )

2 COUNTY OF MONTGOMERY ) SS: CERTIFICATE

3 I, Lisa M. Conley Yungblut, a Notary  
4 Public within and for the State of Ohio, duly  
5 commissioned and qualified,

6 DO HEREBY CERTIFY that the  
7 above-named, JAMAL ANTONIO MURRAY, was by me first  
8 duly sworn to testify the truth, the whole truth  
9 and nothing but the truth.

10 Said testimony was reduced to writing  
11 by me stenographically in the presence of the  
12 witness and thereafter reduced to typewriting.

13 I FURTHER CERTIFY that I am not a  
14 relative or Attorney of either party, in any  
15 manner interested in the event of this action, nor  
16 am I, or the court reporting firm with which I am  
17 affiliated, under a contract as defined in Civil  
18 Rule 28(D).



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IN WITNESS WHEREOF, I have hereunto set my  
hand and seal of office at Dayton, Ohio, on this  
25th day of June, 2018.



*Lisa M. Conley Yungblut*  
LISA M. CONLEY YUNGBLUT, RMR, CRR  
NOTARY PUBLIC, STATE OF OHIO  
My commission expires 7-28-2019

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